

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Christopher M. Brumbaugh and	:	Bankruptcy No.	14-70227-JAD
Amanda K. Brumbaugh,	:		
Debtors	:	Chapter 13	
	:		
J.P. Morgan Chase Bank, N.A.,	:	Document No. 87	
Movant	:		
	:	Related to Claim #13	
v.	:		
Christopher M. Brumbaugh, Amanda K.	:		
Brumbaugh and Ronda J. Winnecour,	:		
Esquire, Chapter 13 Trustee,	:		
Respondents	:		

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE

I, counsel for the above-named Debtors, declare and otherwise certify that I have reviewed the Debtors' existing Amended Plan dated May 13, 2016, have recomputed the plan payment, and find that the existing payment is sufficient to fund the Debtors' Plan, since the Debtors' Chapter 13 account holds a surplus in excess of \$6,000.00. The Movant's escrow notice dated April 24, 2018 designates an increase in Debtors' monthly escrow payment from \$146.80 to \$153.33, and the current monthly mortgage payment designated as being paid to Movant through Debtors' Plan is \$853.70 per month. The new mortgage payment proposed (including the increased escrow payment to account for shortage) is \$860.23 per month, an increase of \$7.33 from the current payment. Over the remaining life of Debtors' Chapter 13 Plan, the increase to be paid to the Movant is \$73.30.

Accordingly, Debtors' plan remains adequately funded to pay the new post-petition monthly payment. The new post-petition monthly payment is \$860.23 per month, effective July 1, 2018, per the escrow notice dated April 24, 2018.

Respectfully submitted,

EVEY BLACK ATTORNEYS LLC

Dated: 6/5/2018

By / s/ Jeffrey A. Muriceak
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